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6 Attorneys for Defendant
SALVADOR ORTIZ-PADILLA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SALVADOR ORTIZ-PADILLA,

15 Defendant.
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Case No. 1:21-cr-00239-JLT-SKO

STIPULATION TO CONTINUE CHANGE OF
PLEA HEARING; ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea
20 hearing currently scheduled for November 13, 2023, may be continued to January 16, 2024, at
21 10:00 a.m.

22 The parties are in the process of finalizing a plea agreement in this matter. Undersigned
23 counsel requires additional time to discuss the plea offer in detail with Mr. Ortiz-Padilla and to
24 file the necessary plea documents. As a result, the parties are requesting to continue the
25 November 13, 2023 change of plea hearing to January 16, 2024. This will provide time for the
26 parties to finalize the plea documents prior to the change of plea hearing.

27 The requested continuance is made with the intention of conserving time and resources
28 for both the parties and the Court. The government is in agreement with this request and the

1 requested date is a mutually agreeable date for both parties. The parties stipulate that for the
2 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the
3 date of this order through January 16, 2024, for defense preparation and investigation, pursuant
4 to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice are served by
5 resetting the status conference date outweigh the best interest of the public and the defendant in a
6 speedy trial.

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8 Respectfully submitted,

9 HEATHER E. WILLIAMS
10 Federal Defender

11 Date: November 6, 2023

/s/ Reed Grantham
12 REED GRANTHAM
Assistant Federal Defender
13 Attorney for Defendant
SALVADOR ORTIZ-PADILLA

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15 PHILLIP A. TALBERT
United States Attorney

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17 Date: November 6, 2023

/s/ Justin Gilio
18 JUSTIN GILIO
Assistant United States Attorney
19 Attorney for Plaintiff
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ORDER

IT IS SO ORDERED. The change of plea hearing currently set for November 13, 2023, is hereby continued to January 16, 2024, at 10:00 a.m.

The time through January 16, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **November 6, 2023**


UNITED STATES DISTRICT JUDGE